



VERMONT SECRETARY OF STATE

Corporations Division

MAILING ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

DELIVERY ADDRESS: Vermont Secretary of State, 128 State Street, Montpelier, VT 05633-1104

PHONE: 802-828-2386

WEBSITE: www.sec.state.vt.us

02/06/2019

Compact Information Systems

PO Box 140

Redmond WA 98073

RE: Acceptance of Data Broker Registration THIS IS NOT A BILL

This letter is to confirm the acceptance of the following Data Broker:

Type of Request:

DATA BROKER REGISTRATION

Work Order Number	: 2013570018	Filing Number	: 0002511168
Date Accepted	: 2/6/2019	Payment Received	: \$100.00
Work Order Payment Total	: \$100.00	Client ID	: 000238489

The Vermont Secretary of State

Division of Corporations

Visit us online at www.sec.state.vt.us

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WEBSITE: www.sec.state.vt.us**1. Acknowledgement Information.**

- a. **Name:** Compact Information Systems .
- b. **Acknowledgement Address:** PO Box 140, Redmond, WA, 98073, USA
- c. **Email Address:** _____
- d. **Phone No:** _____

2. Data Broker Information.

- a. **Name:** COMPACT INFORMATION SYSTEMS
- b. **Primary Physical Address:** 7120 185th Ave NE, Ste 150, Redmond, WA, 98052, USA
- c. **Primary Email Address:** pat@cisdirect.com
- d. **Primary Internet Address (URL):** www.cisdirect.com

3. Does the data broker permit a consumer to opt out of the data broker's collection of brokered personal information, opt out of its databases or opt out of certain sales of data? ☒ Yes ☐ No*If so:***a. What was the method for requesting an opt-out?**

A person can contact us via a tollfree phone number, e-mail or regular mail to opt-out. Once received, we immediately and permanently remove this person from our database.

b. If the opt-out applied to only certain activities or sales, which ones?

Our opt-out policy applies to everything we do.

c. Does the data broker permit a consumer to authorize a third party to perform the opt-out on the consumer's behalf?
yes.**4. Statement specifying the data collection, databases or sales activities from which a consumer may not have opted out during the prior year:**

n/a

5. Statement regarding whether the data broker implemented a purchaser credentialing process during the prior year:

We have been in business for 30 years and thoroughly review each entity and would like to do business with us, rejecting any relationship where the potential customer does not meet industry best practices.

6. The number of security breaches that the data broker experienced during the prior year: 0 .

Total number of consumers affected by the breaches: 0 .



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- 7. Where the data broker has actual knowledge that it possesses the brokered personal information of minors, provide a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors:**

We do not maintain any PII of minors.

- 8. Any additional information or explanation the data broker chooses to provide concerning its data collection practices during the prior year:**

none at this time.

9. Certification of Annual Registration.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate.

Pat Wiley

PRINTED NAME

Pat Wiley

SIGNATURE

02/06/2019

DATE



Vermont Secretary of State
ANNUAL REGISTRATION OF DATA BROKERS

"Data broker" means a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship. 9 V.S.A. § 2430(4).

Registration ID: _____

VT SOS-CORPS. DIV.
JAN 29 2019 PM 12:55

1. Return Acknowledgement to: Required - Name and Address

Name _____
Compact Information Systems
Address _____
PO Box 140
Address _____
Redmond WA 98073
Address _____

Processed by: _____
FOR OFFICE USE ONLY

This registration is required annually between January 1 and January 31 following a calendar year in which a person meets the definition of a data broker as provided above. 9 V.S.A. § 2446.

Each response should be answered with specificity. A reference to a company website, general policy or terms of service would not be an appropriate response. You may supplement your response with a reference to a specific page of a website, but this may not replace a specific response.

2. Data Broker¹ Information. Required.

- a. Name: Compact Information Systems
- b. Primary Physical Address: 7120 185th Ave NE STE 150 Redmond WA 98052
- c. Primary Email Address: pat@cisdirect.com
- d. Primary Internet Address (URL): www.cisdirect.com

3. Does the data broker permits a consumer to opt out of the data broker's collection of brokered personal information,² opt out of its databases, or opt out of certain sales of data? Required. ☒ Yes ☐ No

If so:

- a. What is the method for requesting an opt-out?

A person can contact us via a tollfree phone number, e-mail or regular mail to opt-out. Once received, we immediately and permanently remove this person from our database.

- b. If the opt-out applies to only certain activities or sales, which ones?

Our opt-out policy applies to everything we do.

- c. Does the data broker permits a consumer to authorize a third party to perform the opt-out on the consumer's behalf?

Yes.

4. Statement specifying the data collection, databases, or sales activities from which a consumer may not opt out: Required.

N/A

5. Statement regarding whether the data broker implements a purchaser credentialing process: Required.

We have been in business for 30 years and thoroughly review each entity that would like to do business with us, rejecting any relationship where the potential customer does not meet industry best practices.

6. Statement regarding whether the data broker implements a purchaser credentialing process: Required.

See # 5.



Vermont Secretary of State
ANNUAL REGISTRATION
of Data Brokers

VT SOS-CORPS. DIV.
JAN 29 2019 PM 12:55

7. a. The number of security breaches³ that the data broker¹ has experienced during the prior year: Required. None.

b. If known, the total number of Vermont residents affected by the breaches: N/A.

8. Where the data broker has actual knowledge that it possesses the brokered personal information² of minors, a statement detailing the data collection practices, databases, sales activities, and opt-out policies that are applicable to the brokered personal information of minors: Required.

We do not maintain any PII of minors.

9. Any additional information or explanation the data broker chooses to provide concerning its data collection practices: Optional.

None at this time.

10. Certification of Annual Registration: Required.

I hereby certify, under penalty of law (13 V.S.A. Ch. 65), as an authorized representative of the data broker, that the all of the above information is accurate; and that this document is provided with a Check or Money Order, payable to "VT SOS" in the amount of \$100.00.

Pat Wiley

Printed Name

Signature

1/15/2019

Date

¹ "Data broker" means a business, or unit or units of a business, separately or together, that knowingly collects and sells or licenses to third parties the brokered personal information of a consumer with whom the business does not have a direct relationship. Examples of a direct relationship with a business include if the consumer is a past or present customer, client, subscriber, user, or registered user of the business's goods or services; employee, contractor, or agent of the business; investor in the business; or donor to the business. The following activities conducted by a business, and the collection and sale or licensing of brokered personal information incidental to conducting these activities, do not qualify the business as a data broker: developing or maintaining third-party e-commerce or application platforms; providing 411 directory assistance or directory information services, including name, address, and telephone number, on behalf of or as a function of a telecommunications carrier; providing publicly available information related to a consumer's business or profession; or providing publicly available information via real-time or near-real-time alert services for health or safety purposes. The phrase "sells or licenses" does not include: a one-time or occasional sale of assets of a business as part of a transfer of control of those assets that is not part of the ordinary conduct of the business; or a sale or license of data that is merely incidental to the business. 9 V.S.A. § 2430(4).

² "Brokered personal information" means one or more of the following computerized data elements about a consumer, if categorized or organized for dissemination to third parties: name; address; date of birth; place of birth; mother's maiden name; unique biometric data generated from measurements or technical analysis of human body characteristics used by the owner or licensee of the data to identify or authenticate the consumer, such as a fingerprint, retina or iris image, or other unique physical representation or digital representation of biometric data; name or address of a member of the consumer's immediate family or household; Social Security number or other government-issued identification number; or other information that, alone or in combination with the other information sold or licensed, would allow a reasonable person to identify the consumer with reasonable certainty. "Brokered personal information" does not include publicly available information to the extent that it is related to a consumer's business or profession. 9 V.S.A. § 2430(1).

³ "Security breach" means unauthorized acquisition of, electronic data or a reasonable belief of an unauthorized acquisition of, electronic data that compromises the security, confidentiality or integrity of a consumer's personally identifiable information maintained by a data collector. "Security breach" does not include good faith but unauthorized acquisition of personally identifiable information by an employee or agent of the data collector for a legitimate purpose of the data collector; provided that the personally identifiable information is not used for a purpose unrelated to the data collector's business or subject to further unauthorized disclosure. In determining whether personally identifiable information has been acquired or is reasonably believed to have been acquired by a person without valid authorization, a data collector may consider the following factors, among others: indications that the information is in the physical possession and control of a person without valid authorization, such as a lost or stolen computer or other device containing information; indications that the information has been downloaded or copied; indications that the information was used by an unauthorized person, such as fraudulent accounts opened or instances of identity theft reported; or that the information has been made public. 9 V.S.A. § 2430(12).